

EXHIBIT 56-B
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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

IN RE: FACEBOOK, INC., MDL No. 2843
CONSUMER USER PROFILE Case No.
LITIGATION 18-md-02843-VC-JSC

This document relates to:
ALL ACTIONS

HIGHLY CONFIDENTIAL ATTORNEYS' EYES ONLY
ZOOM DEPOSITION OF FACEBOOK'S 30(b)(6)
CORPORATE REPRESENTATIVE - HARRISON FISK
(Reported Remotely via Video & Web Videoconference)
Menlo Park, California (Deponent's location)
Tuesday, August 16, 2022
Volume 1

STENOGRAPHICALLY REPORTED BY:
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DEPOSITION OF HARRISON FISK, taken on
behalf of the Plaintiffs, with the deponent located
in Menlo Park, California, commencing at
9:12 a.m., Tuesday, August 16, 2022, remotely
reported via Video & Web videoconference before
REBECCA L. ROMANO, a Certified Shorthand Reporter,
Certified Court Reporter, Registered Professional
Reporter.

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1 part -- so in Scuba, you can view like the 11:55:07
2 [REDACTED] of a [REDACTED] But you have to [REDACTED] which
3 [REDACTED] you're [REDACTED] And so that's where
4 you'd have to [REDACTED] the -- the [REDACTED] that's --
5 [REDACTED] -- I believe you're saying [REDACTED] 11:55:15
6 [REDACTED] And once you have that, you can then [REDACTED]
7 [REDACTED] the [REDACTED] with that [REDACTED]
8 [REDACTED]
9 Q. (By Mr. Samra) Is there any document
10 showing what the [REDACTED] are in these -- the 11:56:04
11 [REDACTED] with [REDACTED]?
12 MS. RICHARDSON: Objection. Vague.
13 Scope.
14 THE DEPONENT: I mean, I'm not aware of a
15 document like that. Again, the team may have 11:56:22
16 something, but I don't know. There's -- there's no
17 like automatic thing that describes anything.
18 Q. (By Mr. Samra) And is that the same for
19 [REDACTED]?
20 A. Yes. 11:56:50
21 Q. Do third parties have access to [REDACTED]
22 provided from [REDACTED]
23 A. No.
24 Q. Do third parties have access to [REDACTED]
25 A. No. Whenever a third party could 11:57:31

1 potentially have any sort of access, there's always 11:57:37
2 a lot of controls in order to restrict and ensure
3 that doesn't happen inappropriately.

4 Q. When could a third party have access?

5 A. Directly into [REDACTED] or [REDACTED] I'm not 11:58:01
6 aware of any.

7 Q. What about [REDACTED]

8 A. No, I'm not aware of any.

9 Q. You testified that whenever a third party
10 could potentially have access -- 11:58:12

11 A. Yes.

12 Q. -- it would be -- there would be a lot of
13 controls?

14 A. Yes.

15 Q. What were some of the instances of 11:58:20
16 potential access that you were referring to?

17 A. Again, for access through those tools,
18 I'm not aware of any.

19 Q. What about [REDACTED] are you aware of any
20 access by third parties? 11:58:40

21 A. No.

22 Q. [REDACTED]

23 A. No.

24 Q. [REDACTED]

25 A. No. 11:58:49

1 Q. [REDACTED] 11:58:52

2 A. No.

3 MR. SAMRA: Okay. Thank you.

4 I think this is a good place for a break.

5 We can go off the record. 11:58:59

6 MS. RICHARDSON: Sure. How -- how long

7 do you want for a lunch, Josh?

8 MR. SAMRA: I'll leave it to Mr. Fisk and

9 Rebecca and John.

10 Oh, I think we're still on the record, 11:59:07

11 though.

12 MS. RICHARDSON: Do you want to go off

13 the record and we can talk about lunch.

14 THE VIDEOGRAPHER: Sure. Okay. We're

15 off the record. It's 11:59 a.m. . 11:59:19

16 (Recess taken.)

17 THE VIDEOGRAPHER: Okay. We're back on

18 the record. It's 1:03 p.m.

19 Q. (By Mr. Samra) Mr. Fisk, do you

20 understand you're still under oath? 01:03:11

21 A. Yes.

22 Q. We briefly discussed [REDACTED] and

23 [REDACTED]

24 Do you recall that?

25 A. Yes. 01:03:26

1 Q. Okay. So when it's generate -- when 04:00:32
2 it -- when the PDF is created --
3 A. Yes.
4 Q. -- is it reflective of the [REDACTED]
5 [REDACTED] as of July 1st, 2022, or is it reflective 04:00:42
6 of the [REDACTED] as of October 28th, 2020?
7 A. So there's two sets of [REDACTED] here.
8 The first [REDACTED] will be the [REDACTED] [REDACTED]
9 when this was generated in July. And then this set
10 would be from the October 28th, 2020, instead. 04:01:00
11 So there's essentially two -- two copies
12 of [REDACTED] One from the past and one from the
13 current when this was taken.
14 Q. Thank you.
15 Switching gears a bit. 04:01:21
16 I want to talk to you about APIs and how
17 they interact with Facebook and -- or excuse me --
18 Hive and TAO.
19 Are you aware generally of Graph API?
20 A. Yes. 04:01:42
21 Q. And are you aware that Graph API allows
22 applications to access users' information?
23 A. The Graph API has specific data that
24 allows access to with user permissions and other
25 sorts of controls, but yes. 04:02:04

1 Q. And using [REDACTED], as an example, what 04:02:10
2 happens in [REDACTED] when third parties make [REDACTED]
3 [REDACTED] for [REDACTED]

4 A. Yeah. So the [REDACTED] cannot possibly
5 [REDACTED]. It's both a -- a policy. But also a 04:02:25
6 technical infeasibility for [REDACTED] to [REDACTED] any
7 sort of [REDACTED] in the [REDACTED]

8 Q. What intermediate steps are taken, if
9 any, on [REDACTED] when an [REDACTED] is made on
10 [REDACTED]? 04:02:48

11 A. So, again, there's no -- there's no
12 [REDACTED] between [REDACTED] and
13 [REDACTED]

14 Q. Are [REDACTED] requests logged in [REDACTED]

15 A. I believe there could be logs that are 04:03:10
16 generated from these [REDACTED] that are [REDACTED] into [REDACTED]

17 Q. Is there a log of the third parties that
18 have [REDACTED] to [REDACTED]

19 MS. RICHARDSON: Objection. Beyond the
20 scope. 04:03:31

21 THE DEPONENT: Yeah. I'm not exactly
22 sure how the third-party [REDACTED] of these [REDACTED] are
23 [REDACTED] I know there's various logs and
24 various [REDACTED] that go into it. But I don't know
25 all the specifics. 04:03:44

1 SPECIAL MASTER GARRIE: Counsel Samra, 04:45:54
2 any further questions?
3 EXAMINATION
4 BY MR. SAMRA:
5 Q. Mr. Fisk, earlier you were testifying 04:45:59
6 about AI researchers having [REDACTED] to [REDACTED]
7 correct?
8 A. Yes.
9 Q. Are you aware of any external researchers
10 having [REDACTED] to [REDACTED] 04:46:11
11 A. No.
12 Q. What about to [REDACTED]
13 A. No.
14 Q. Are you aware of external researchers
15 having [REDACTED] to any of the [REDACTED] that we discussed 04:46:21
16 today?
17 A. No.
18 MR. SAMRA: Okay. No further questions.
19 MS. RICHARDSON: And we're all -- we're
20 all done, too. 04:46:34
21 SPECIAL MASTER GARRIE: Okay. So
22 Counsel Richardson, would you like to designate the
23 transcript?
24 MS. RICHARDSON: I would. I'd like to
25 designate it as "Confidential" for now, and then 04:46:43

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